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U.S. EPA, REG. 5

May 4, 1999

USEPA
Air and Radiation Division
Region 5
77 West Jackson Blvd.
Chicago, IL. 60604-3590

Dear Sirs,

Attached is a copy of the Compliance Certification sent along with our Annual Emissions Report to the Illinois EPA as directed in our Draft Title V Permit.

Sincerely,

Ronald Reinstein
Compliance Manager

RR/rr

cc: James Valukas, Chris Bergman

14.0 COMPLIANCE CERTIFICATION

A requirement of both the federal and state Title V permit programs is that a responsible official sign a statement attesting to the truth, accuracy, and completeness of the Title V permit application. The compilation of the large amount of information and data required to prepare this CAAPP application document involved numerous facility and corporate personnel as well as outside contractors and legal counsel. Throughout the application process, standard operating procedures were incorporated which involved developing the most accurate and currently available data, review of that data by competent individuals with the appropriate experience and knowledge, and preparation of accurate, factual information for presentation in the application. The application was prepared by the Facility's environmental management with the assistance of legal counsel.

Accurate has designated James L. Vaiukas as the responsible official charged with signing the application certification. Mr. Valukas has reviewed this document and the contents with the individuals responsible for preparing the submittal. Based on his understanding of the regulatory requirements, the overall Facility's operations, and the information presented to him, he has signed the CAAPP certification block. By signing this certification block, he is confirming the following:

Based on information and belief formed after reasonable inquiry, the source identified in this application complies, and will continue to comply, with all applicable federally-enforceable applicable requirement(s).

Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federally-enforceable applicable requirement(s) that will become effective during the permit term.

Based on information and belief formed after reasonable inquiry, information and statements in the amended application package, including all accompanying reports and required certifications, are true, accurate and complete.

By signing the CAAPP application, James L. Valukas declares under penalty of perjury that the statements located above the signature portion of the CAAPP certification form of this application are correct and true.

Document Number: 158852.1



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19508
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

COMPLIANCE CERTIFICATION	FOR AGENCY USE ONLY
	ID NUMBER: _____
	PERMIT #: _____
	DATE: _____

AN APPLICATION FOR A CAAPP PERMIT MUST CONTAIN A CERTIFICATION OF COMPLIANCE SIGNED BY A RESPONSIBLE OFFICIAL. THIS FORM MUST BE SUBMITTED WITH THE ORIGINAL CAAPP PERMIT APPLICATION AND UPDATED ON AN ANNUAL BASIS.

SOURCE INFORMATION	
1) SOURCE NAME: Accurate Dispersions, a Division of McWhorter Tech.	
2) DATE FORM PREPARED: 4/20/99	3) SOURCE ID NO. (IF KNOWN): 031297ACG
4) CAAPP PERMIT NUMBER (IF KNOWN): 98030121	
5) IS THIS THE FIRST SUBMITTAL OF THIS FORM? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
IF NO, WHAT IS THE REPORTING PERIOD COVERED BY THIS FORM? 3 / 23 / 98 TO: 3 / 23 / 99	

SOURCE COMPLIANCE INFORMATION
6) DOES THE SIGNATORY OF THIS FORM HEREBY CERTIFY THAT THE SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
IF NO, EXPLAIN:
7) PROVIDE THE SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATION DURING THE PERMIT TERM, E.G., ONCE ANNUALLY IN JANUARY (NOTE THAT SUCH CERTIFICATION MUST BE SUBMITTED NO LESS FREQUENTLY THAN ANNUALLY): Once Annually
8) INDICATE THE COMPLIANCE STATUS OF THE SOURCE WITH ANY APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS OF THE CLEAN AIR ACT, E.G., NO ENHANCED MONITORING REQUIRED AND IN COMPLIANCE WITH COMPLIANCE CERTIFICATION REQUIREMENTS: Compliance assurance monitoring does not apply to any emissions at this facility

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE _____

FOR APPLICANT'S USE

9a) THE FOLLOWING EMISSION UNITS ARE IN COMPLIANCE WITH APPLICABLE REQUIREMENTS SUCH AS EMISSION STANDARDS, EMISSION CONTROL REQUIREMENTS, EMISSION TESTING, COURT REQUIREMENTS, WORK PRACTICES, OR ENHANCED MONITORING, BASED ON THE COMPLIANCE METHODS SPECIFIED BELOW (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-1):

APPLICATION PAGE _____
Printed on Recycled Paper
296-CAAPP

9b) LIST THE EMISSION UNITS THAT WERE NOT IN CONTINUOUS COMPLIANCE SINCE THE LAST REPORTING PERIOD, AND THE REASON(S) FOR NONCOMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-2.): n/a

EMISSION UNIT

REASON(S) FOR NONCOMPLIANCE

COMPLIANCE INFORMATION

10) SUMMARY OF METHODS USED TO DETERMINE COMPLIANCE:

a) DESCRIPTION OF TESTING METHODS USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-3.):

Periodic stack test and continuous temperature recording on after burners

10b) DESCRIPTION OF MONITORING PROCEDURES USED TO DEMONSTRATE COMPLIANCE, INCLUDING ANY ENHANCED MONITORING REQUIREMENTS OF THE ACT (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-4.):

Periodic stack test and continuous temperature recording on after burners

c) DESCRIPTION OF RECORDKEEPING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-5.):

Inventory of raw materials used for production purposes at both plants. Amount of wash solvent used at both plants. Records of thermal oxidizer temperatures.

10d) DESCRIPTION OF REPORTING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-8.):

Periodic reporting pursuant to 35 IAC 218.637.
Annual reporting pursuant to 218.307.

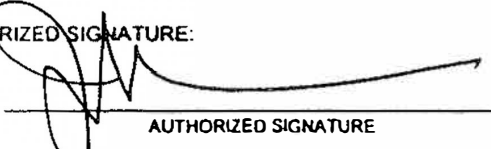
SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

11) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE:

BY:



AUTHORIZED SIGNATURE

James L. Valukas

TYPED OR PRINTED NAME OF SIGNATORY

President

TITLE OF SIGNATORY

4 / 23 / 99

DATE

6.0 LIST OF EMISSION UNITS AND POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT

<u>ID</u>	<u>Name</u>
P1E1	20L Eiger Mill
P1E2	20L Eiger Mill
P1E3	40L Eiger Mill
P1E4	40L Eiger Mill
P1E5	20L Eiger Mill
P1E6	75L Eiger Mill
P1E7	40L Eiger Mill
P1E8	40L Eiger Mill
P1E9	40L Eiger Mill
P1L1	75M Lab Mill
P1L2	75M Lab Mill
P1X1	HP20 Mixer
P1X2	HP50 Mixer
P1X3	HP20 Mixer
P1X4	HP10 Mixer
P1X5	HP20 Mixer
P1X6	HP50 Mixer
P1X7	HP50 Mixer
P1X8S	3HP Mixer
P1X9S	3HP Mixer
PW1	Parts Washer
PW2	Parts Washer
PW3	Parts Washer
TW	SP50/80 Tank Washer
H-1	Lab Spray Hood (insignificant activity)
WIH	Walk-in hood
DC-1	Dustvent Dust Collector
DC-2	90-5 Torit Dust Collector
TO-1	Thermal Oxidizer
DC-3	DFT3-24 Dust Collector
P2E1	75L Eiger Mill
P2E2	75L Eiger Mill
P2E3	75L Eiger Mill
P2E4	75L Eiger Mill
P2E5	75L Eiger Mill
P2E6	75L Eiger Mill
P2X1	HP50/100 Mixer
P2X2	HP20 Mixer
P2X3	HP20 Mixer
P2X4	HP50/100 Mixer
P2X5	HP50/100 Mixer

P2X6
P2X7
P2X8
P2X9
P2X10
P2X11
P2X12
P2X13
P2L1
STILL
H-2
FJS

HP20 Mixer
HP20 Mixer
HP50/100 Mixer
HP50CD
HP200 Mixer
HP200 Mixer
HP200 Mixer
HP200 Mixer
75M Lab Mill
Roto3 Solvent Recovery Still
Lab Spray Hood (insignificant activity)
Side-Loading Carbon Adsorber

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